

## United States District Court

SOUTHERN

DISTRICT OF TEXAS

TEXAS

McALLEN DIVISION

MAY 29 2015

UNITED STATES OF AMERICA

V.

Clerk of Court

CRIMINAL COMPLAINT

1 Gonzalo Ivan Juarez-Morales

A202 075 412

YOB: 1995

Principal

United Mexican States

Case Number:

M-15- 865 -M

2 Raul Zarasua-Lira

A202 139 496

YOB: 1995

Principal

United Mexican States

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 5/28/2015 in Hidalgo County, in the Southern District of Texas defendants(s) did,  
*(Track Statutory Language of Offense)*

knowing or in reckless disregard of the fact that Jesus Eduardo Antonio-Rodriguez citizen and national of Mexico and Adonis Salvador Yanes-Andrade a citizen and national from El Salvador and eight (8) other undocumented aliens, for a total of ten (10), who had come to, entered, or remained in the United States in violation of law, did knowingly transport, or move or attempts to transport said aliens in furtherance of such violation of law within the United States, that is from a location near the Rio Grande River to the point of arrest near San Juan, Texas; concealed, harbored or shielded from detection or attempt to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation;

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii), (a)(1)(A)(iii)

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

## SYNOPSIS:

On May 28, 2015, the Rio Grande Valley Field Intelligence Team (FIT) Unit along with San Juan Police Department, Hidalgo County Constables and HSI conducted a consensual search at 1510 Mary Ann St. in San Juan, Texas which resulted in a 2 on 10 Criminal Alien Smuggling Case.

## PREVIOUS INFORMATION:

On May, 15th, 2015, RGV SIU FIT Agents received information from a concerned citizen in reference to a possible stash house located at 1510 Mary Ann St. in San Juan, Texas. The concerned citizen called the Rio Grande Valley Sector Operations Center and advised that a white older model suburban drops off undocumented immigrants several times a week between the times of 3:00am and 4:00 am at the target location.

## SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

*Apparal*  
*Jorge Leonard*

*f*  
 Signature of Complainant

Julio Ibarra

Senior Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

May 29, 2015

Date

at McAllen, Texas

City and State

Dorina Ramos

, U. S. Magistrate Judge

Name and Title of Judicial Officer

*Dorina Ramos*  
 Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

M-15-865 -M

**RE: Gonzalo Ivan Juarez-Morales  
Raul Zarasua-Lira**

**A202 075 412  
A202 139 496**

**OBSERVATIONS:**

On May 15, 2015, BPA-I Abel Montilla conducted surveillance at the target location. Upon continued surveillance, FIT Agents located a blue house with two vehicles parked in front, a white older model Chevy Suburban and a blue older model sedan displaying Mexico, Tamaulipas plates XEW 69 05. Upon conducting checks on both vehicles, it was revealed that the white suburban is registered to Gilberto Gonzalez Jr. of McAllen. TX.

On May 19, 2015 at approximately 10:15 a.m., Agent Montilla observed a white Chevrolet Impala arrive at the target location. The driver of the Impala opened the trunk and pulled several bags of appeared to be food and took them inside the target location. Moments later the subject left the target location.

**ENCOUNTER:**

On May 28, 2015, FIT Agents continued surveillance at the target location. While conducting surveillance, Agents observed that two male subjects load into the suburban and traveled north on Mary Ann St. FIT Agents monitored the suburban and following into the parking lot of Fiesta Inn in McAllen, Texas. The driver then traveled to Houston St to pick up a third subject. Agents then observed that the vehicle traveled back to the Fiesta Inn and deliver the subject. Approximately one hour later, Agents noticed the same subjects and two additional females get into the suburban and started traveling east on Houston St. and then south on 16th St. at this time Agents contacted McAllen Police Department for assistance. McAllen Police Department then assisted FIT agents to conduct an identification stop. McAllen Police Officer Gonzalez as well as Border Patrol Agents approached the vehicle and after further interview it was revealed that four of the passengers were illegal in the United States and one female juvenile claimed to be a United States Citizen. At that time, Agent Alvarado advised the occupants of their rights and continued with the field interview. Upon interviewing the driver, identified as Gonzalo Ivan Juarez-Morales, revealed that he was transporting undocumented subjects. In addition, Juarez-Morales stated that he was in charge of the target location and was renting a room at the location, 1510 Mary Ann St. in San Juan, Texas. He also admitted that he had eight additional undocumented aliens in the target location in San Juan, Texas. FIT Agents asked for and were granted consent to search the room where he was holding the undocumented aliens. Subject granted consent and provided a key to the target location.

FIT Agents along with San Juan Police Department, Hidalgo County Constables and HSI then proceeded to the target location, in San Juan, Texas, and conducted a consensual search of the area. Upon arrival agents noticed that a subject attempted to abscond through the back door. San Juan Police Department conducted a search and upon conducting a full search of the target location Agents discovered eight subject that were illegal in the United States. All subjects included the one that attempted to abscond were detained and transported to the Weslaco Station for further processing.

**UNITED STATES DISTRICT COURT  
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**M-15-865 -M**

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Raul Zarasua-Lira A202 139 496**

**PRINCIPAL STATEMENTS:**

Gonzalo Ivan Juarez-Morales and Raul ZARASUA-Lira were advised of their Miranda Rights, understood their rights and were willing to provide a sworn statement without the presence of an attorney.

**PRINCIPAL 1: JUAREZ-Morales**

Gonzalo Ivan Juarez-Morales, a citizen of Mexico, claims to have lived in the United States for approximately six months. Subject claims he paid \$200.00 USD to be smuggled into the United States, and his destination was San Juan, Texas to live with his father. Juarez stated that he started working for his brother-in-law Rodolfo Hernandez by smuggling illegal aliens in Reynosa, Mexico. He stated that while working at a warehouse in Edinburg, Texas, he contacted subject Raul Zarazua, in which Zarazua provided him with contacts to transport and harbor illegal aliens. Juarez-Morales stated that he utilized his home located at 1510 Mary Ann, San Juan, Texas to harbor illegal aliens and that Raul Zarazua paid him \$70.00 United States Dollars per alien. Subject Juarez-Morales was able to identify Raul Zarazua through Photo lineup.

**PRINCIPAL 2: ZARASUA-Lira**

Raul Zarasua-Lira, a citizen of Mexico, claims he last entered into the United States approximately two years ago and paid \$800.00 to be smuggled into the United States illegally. Zarasua claims his destination was McAllen, Texas where his girlfriend lives. He claims to support himself by working in construction and while working in construction he met a man by the name of Gabriel DeAntes who offered to pay him \$70.00 to pick up Undocumented Illegal Aliens and drop them off at different locations. Zarasua claims he started working for DeAntes approximately one month ago and his friend Gonzalo Ivan JUARES-Morales was the driver of the Chevy suburban that was used to pick up illegal aliens from Hidalgo, Texas and take them to the stash house in San Juan, Texas. Subject was able to identify JUARES-Morales through photo lineup and also the subject who drove the Chevy suburban who picked up the illegal alien from Hidalgo, Texas and take them to the stash house. Subject claims he was going to pay JUARES-Morales half of what he was going to get paid for helping him out.

**MATERIAL WITNESS STATEMENTS:**

Jesus Eduardo Antonio Rodriguez and Adonis Salvador YANES-Andrade were advised of their Miranda Rights, understood their rights and were willing to provide a sworn statement without the presence of an attorney.

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SOUTHERN DISTRICT OF TEXAS  
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**#1**

Jesus Eduardo Antonio-Rodriguez, a citizen of Mexico, stated that he crossed the river illegally on May 27, 2015 near Reynosa, Mexico in a raft in a group of eight. Antonio-Rodriguez claims to have already paid \$500.00 to be smuggled into the United States. He states the group walked for about two hours and waited for additional six hours to be picked up. Antonio-Rodriguez stated that a white Suburban occupied by a male driver and a male passenger picked up the group and took them to the house where they were apprehended. He further stated that the driver told everyone to get inside the vehicle and at the house the passenger instructed everyone to go inside. Antonio-Rodriguez also stated that the passenger gave everyone something to eat. Jesus Eduardo Antonio-Rodriguez was shown a photo lineup and he positively identified Raul Zarasua-Lira as the driver that took him to the house where he was arrested at today. Antonio-Rodriguez was shown a photo lineup and he positively identified, Gonzalo Ivan Juarez Morales, as the passenger that took him to the house where he was arrested at today.

**#2**

Adonis Salvador YANES-Andrade, a citizen of El Salvador, admitted to illegally entering the United States on May 27, 2015 with approximately seven other subjects and met with an additional female subject in the brush after entering the United States. He stated that he was to pay \$3,000 to be smuggled into the United States. YANES-Andrade stated that the group was picked up by an older model Chevrolet vehicle with two occupants inside. YANES was able to identify Gonzalo Ivan JUAREZ-Morales as the driver and also Raul ZARASUA-Lira through photo lineup as the passenger of the vehicle that picked the group up from the river and transported them to the house where they were arrested. YANES stated that the passenger, ZARASUA, instructed them to get into the back of the vehicle which did not contain seats and to keep their heads down. The driver, JUAREZ, also instructed them to stay quiet and not to move during the approximately 40 minute trip to a house. ZARASUA then opened the gate to the property and the front door to the house and then returned back to the vehicle and instructed JUAREZ to remove the subjects. JUAREZ instructed them to exit the vehicle one by one and to enter the house. Once inside, JUAREZ and LIRA stated that someone would return for them at a later time and both subjects departed the residence.